

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LONTEX CORPORATION,

Plaintiff,

v.

NIKE, INC.,

Defendant.

Civil Action No.: 18-cv-5623

(Hon. Michael M. Baylson)

DEFENDANT NIKE, INC.’S OMNIBUS MOTION ON DEPOSITION DESIGNATIONS

Pursuant to Federal Rule of Civil Procedure 32, the Federal Rules of Evidence, and Paragraph 5.a of this Court’s April 22, 2021 Pretrial Order (ECF No. 254), Defendant NIKE, Inc. (“NIKE”) moves for an Order sustaining certain of its objections to the deposition testimony that Lontex has designated for use at trial. In support of this Motion, NIKE submits the attached Memorandum of Law and Proposed Order.

July 15, 2021

Respectfully submitted,

By: /s/ Gina L. Durham

DLA PIPER LLP (US)

Gina L. Durham (*pro hac vice*)
555 Mission Street, Suite 2400
San Francisco, CA 94105

Frank W. Ryan (*pro hac vice*)
Andrew J. Peck (*pro hac vice*)
Michael D. Hynes (*pro hac vice*)
Marc E. Miller (*pro hac vice*)
1251 Avenue of the Americas
New York, NY 100201

Ilana H. Eisenstein
Ben C. Fabens-Lassen
1650 Market Street, Suite 5000
Philadelphia, PA 19103

Attorneys for Defendant NIKE, Inc.